

EXHIBIT 2

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN**

THE SHANE GROUP, INC. *et al.*,

Plaintiffs, on behalf of themselves
and all others similarly situated

vs.

BLUE CROSS BLUE SHIELD OF
MICHIGAN,

Defendant.

Civil Action No. 2:10-cv-14360-DPH-
MKM

Judge Denise Page Hood
Magistrate Judge Mona K. Majzoub

DECLARATION OF MICHELLE LA COUNT

I, Michelle La Count declare as follows:

1. I am a Project Director at Epiq, the Claims Administrator in this settlement.

BACKGROUND

2. On October 28, 2022, Class Counsel forwarded a copy of the letter that Mr. Schubert had sent to the Court, about the defect notice which he had received relating to his mother's estate's claim.

3. I requested the case team research the claim's current status, any underlying information that might allow me to assist the claimant in perfecting the claim, and contact information for Mr. Schubert to the extent it was available.

ATTEMPTS TO CONTACT MR. SCHUBERT

4. On October 31, 2022, I attempted to call Mr. Schubert at the phone number he provided on the Claim Form; my call went to voicemail and I left a message indicating I was calling from the Shane v. Blue Cross Blue Shield of Michigan settlement administration and provided both my name and direct dial telephone number for Mr. Schubert to call me back.

5. On November 2, 2022, I again attempted to call Mr. Schubert at the phone number he provided on the Claim Form. Again, my call went to voicemail and I left another message with the same details as noted above.

6. On November 2, 2022, I sent a letter via USPS First Class Mail to Mr. Schubert addressing both his letter to the Court and a letter to the Settlement Administrator requesting a copy of the Claim Form. I noted what we believe to be the issue – that he had incorrectly claimed the full value of services rendered for his mother's care rather than the actual amount paid out of pocket to the hospital(s) providing said care – and again provided my direct contact information. It should be noted that this letter was sent to a PO Box and could not be sent by any other means outside of USPS as a result; Mr. Schubert does not have an email address on file either, thus limiting the options for direct communication.

7. On November 29, 2022, a second, follow-up letter enclosing a copy of the November 2, 2022, letter was sent via USPS First Class Mail, again sent to the PO Box that was provided by Mr. Schubert.

CURRENT STATUS OF CLAIM

8. Mr. Schubert has not responded to date, thus there has been no change in status. The claim remains incomplete as the claimed amounts exceed the thresholds for typical payment activity by an individual, thus correction of the claimed amount and/or documentation showing actual payment of the full amount claimed is needed to perfect the claim.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Dated: November 29, 2022

Respectfully submitted,

/s/ Michelle La Count

Michelle La Count